

**IN THE UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MINNESOTA**

LINDA TIRADO,

Plaintiff,

v.

CITY OF MINNEAPOLIS, *et al.*,

Defendants.

Case No.: 20-CV-1338 (JRT/JFD)

**DECLARATION OF MEGAN J. RENSLOW IN SUPPORT OF MOTIONS OF
JOURNALISTS ANDREW MANNIX AND MAXWELL NESTERAK TO QUASH CITY
DEFENDANTS' THIRD-PARTY SUBPOENAS**

Megan J. Renslow, being under penalty of perjury and in accordance with 28 U.S.C. § 1746, states as follows:

1. I am an attorney licensed to practice law in the State of Minnesota. I practice with the law firm of Moss & Barnett, P.A., and I am one of the attorneys representing non-party Maxwell Nesterak ("Nesterak") related to the above-captioned matter.

2. A true and correct copy of the third-party subpoena served upon Mr. Nesterak is attached hereto as Exhibit A.

3. A true and correct copy of Mr. Nesterak's supplemental response to City Defendants' subpoena, dated March 24, 2022, is attached hereto as Exhibit B.

4. Counsel for City Defendants and Mr. Nesterak held a meet and confer on March 24, 2022 and March 25, 2022.

5. At the March 24 meet and confer regarding the subpoena to Mr. Nesterak, counsel discussed the scope of the subpoena. Namely, counsel for Mr. Nesterak raised concerns that the

subpoena went beyond the scope of Plaintiff's claims. Counsel for City Defendants proposed that the subpoena be narrowed to documents and information related to Mr. Nesterak's personal experience as a journalist in relation to any interaction with law enforcement during the dates referenced in the original subpoena.

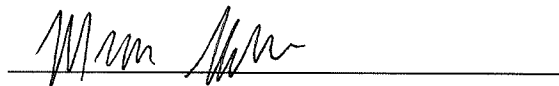
6. At the March 25 meet and confer regarding the subpoena to Mr. Nesterak, counsel for Mr. Nesterak informed counsel for City Defendants that any such documents or information related to Mr. Nesterak's personal experience as a journalist in relation to any interaction with law enforcement during the dates referenced in the original subpoena would fall under the journalistic privilege.

7. On March 28, 2022, counsel for Mr. Nesterak contacted counsel for City Defendants regarding Mr. Nesterak's still-scheduled deposition. Counsel for Mr. Nesterak inquired whether City Defendants would be withdrawing their subpoena and stated that if not withdrawn, Mr. Nesterak would be moving forward with a motion to quash.

8. A true and correct copy of Mr. Nesterak's correspondence to counsel for City Defendants in relation to his motion to quash, dated March 28, 2022, is attached hereto as Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, MN on April 8, 2022.

A handwritten signature in black ink, appearing to read 'Megan J. Renslow', is written over a horizontal line.

Megan J. Renslow